

EXHIBIT E

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF OKLAHOMA

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4 REDBIRD BUSINESS GROUP, LLC;)
REDBIRD BIOSCIENCE OKLAHOMA,)
5 LLC; and RB REALTYCO, LLC,)

6 Plaintiffs,)

7 vs.) Case No.20-cv-00098-0JAR

8 MATTHEW HARRISON,)

9 Defendant-Counterclaim)
Plaintiff.)

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16 DEPOSITION OF WILLIAM THURMAN

17 TAKEN OF BEHALF OF DEFENDANT

18 ON APRIL 4, 2025

19 IN TULSA, OKLAHOMA

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25 REPORTED BY: TAMMIE SHIPMAN, CSR

1 occur.

2 Q. (By Mr. Connelly) Can you recall a single
3 conversation where you discussed this order with John
4 Langham specifically?

5 MS. EISENBERG: You can answer yes or no.

6 A. No.

7 Q. (By Mr. Connelly) Okay. Is there any
8 written communication sent by anybody at Redbird that
9 tells employees or agents of Redbird about this order
10 and the need to comply with it?

11 MS. EISENBERG: Objection.

12 A. We wouldn't distribute private documents to
13 hourly employees. No, not that I'm aware of.

14 Q. (By Mr. Connelly) Are you aware that the
15 Redbird companies have not complied with this order and
16 that they have actually made payments out of their bank
17 accounts after April 30, when this order was entered?

18 MS. EISENBERG: Objection.

19 A. I don't agree.

20 Q. (By Mr. Connelly) Okay. Does that mean
21 you're not aware that there have been any payments out
22 of the bank accounts after April 30?

23 A. It has to operate. It operates. It's an
24 ongoing business concern. The order doesn't say you
25 can't pay payroll and you can't pay the bills. It

1 doesn't say close down the business. I disagree with
2 you.

3 Q. Okay.

4 A. Does it say close down the business?

5 Q. Let's --

6 A. I'm asking -- wait a minute. I'm not
7 supposed to ask the questions. I'm sorry. Anyway --

8 Q. No, let's --

9 A. -- it says that they closed down the
10 business.

11 Q. Let's go back to the text of the order. It
12 states: "It is further ordered that Judgment Debtor
13 shall be and hereby" -- "are hereby ordered not to pay
14 out, transfer, mortgage, alienate, conceal, encumber or
15 make any other disposition of any of Judgment Debtor's
16 money or property, either real or personal, not exempt
17 by law, pending the hearing and further order of the
18 Court." Do you see that?

19 A. I don't consider payroll, the people that
20 have worked --

21 MS. EISENBERG: Sir, the question was, do
22 you see that?

23 A. No, I didn't -- I don't understand the
24 question. What -- how did you phrase that?

25 Q. (By Mr. Connelly) Yeah. I just read the

1 A. I understand, yes.

2 Q. And just to make the math simple, okay,
3 Growers is supposed to pay Realty over two million
4 dollars or more, all right, a year in rent?

5 A. Yes.

6 Q. Right?

7 A. Yes.

8 Q. Mariteq Growers has not paid Realty over
9 two million dollars a year in rent, over the years,
10 correct?

11 A. No.

12 MS. EISENBERG: Objection.

13 Q. (By Mr. Connelly) Mariteq has never made the
14 full rent payment, correct?

15 MS. EISENBERG: Objection.

16 A. I am not aware of it making full rent
17 payments.

18 Q. (By Mr. Connelly) And just -- do you see
19 that the rent starts July 1, 2020?

20 A. Yes.

21 Q. And now we're in April of '25, right?

22 A. Yes.

23 Q. Okay. So if -- through the end of '24,
24 Mariteq Growers was supposed to pay Realty over
25 10 million dollars, right? Five years times that

1 two million dollar number?

2 MS. EISENBERG: Objection.

3 A. That calculation should be with John Langham.
4 He should have them.

5 Q. (By Mr. Connelly) Yeah, but to your
6 understanding?

7 MS. EISENBERG: Objection.

8 A. I would look to John to just simply -- to
9 report to me the ongoing balances.

10 Q. (By Mr. Connelly) And I'm just looking for a
11 rough number, okay? And we can ask him the specific
12 numbers, but today Mariteq Growers owes RealtyCo
13 millions of dollars and, very likely, over 10 million
14 dollars, right?

15 A. I can state that it definitely owes it -- or
16 I can state that, according to this agreement, it owes
17 rent, yes.

18 Q. And it owes back rent in the millions. Do
19 you agree with that?

20 A. I would look to John Langham to identify the
21 balances due.

22 Q. Do you -- is -- is there a record within
23 Redbird anywhere of how much rent is owed to Realty?

24 A. That would be with John Langham and should
25 reside on various balance sheets.